



November 28, 2005

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: 2005 Intereconnected Voice Over Internet Protocol 911 Compliance Letter of  
CordiaIP Corp.  
WC Docket No. 05-196

Dear Ms. Dortch:

Pursuant to 47 C.F.R §9.5(f) and to the November 7, 2005 Public Notice in the above referenced proceeding, CordiaIP Corp. ("Cordia") respectfully submits this Compliance Letter. Cordia has engaged the services of Intrado, Inc. as its 911 service provider based upon Intrado's experience and 911 coverage and we anticipate full compliance with the Commission's order and the availability of full 911 dialing capability to 100% of our subscriber base by year end 2005.

Until Cordia is in compliance with the Commission's VoIP 911 Order Cordia will cease marketing its VoIP services and provisioning orders for new VoIP customers; provision of VoIP service to existing customers will remain unaffected and Cordia will adopt a "grandfather" process for the existing customer base for which we have not yet implemented 911 service.

Respectfully submitted,

/s/ Maria A. Abbagnaro

Maria A. Abbagnaro  
General Counsel  
914-948-5550 x1054

cc: Kathy Berthot, Deputy Chief, [Kathy.berthot@fcc.gov](mailto:Kathy.berthot@fcc.gov)  
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**2005 Interconnected Voice Over Internet Protocol 911 Compliance Letter**  
**WC Docket NO. 05-196**  
**CordiaIP Corp.**  
**November 28, 2005**

**1. 911 Solution**

Cordia has engaged the services of Intrado, Inc. ("Intrado") to serve as its 911 service provider. Services will commence upon integration of Cordia's network with Intrado's; Cordia anticipates the completion of this integration and delivery of 911 service by year end 2005. Through data synchronization and call delivery with Intrado Cordia will be able to deliver basic 911 services to 100% of its VoIP customers and E911 services in all areas where it is technically feasible to do so and where Intrado has coverage.

The V9-1-1™ solution enabled by Intrado provides a true E9-1-1 solution for VoIP Service Providers. Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for Cordia is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Intrado manages the VPC functionality and the Call delivery component on behalf of Cordia thereby enabling a full end to end solution from one service provider.

The only requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Intrado via a real-time interface and the connectivity to Intrado's network to enable live 911 call delivery.

**2. 911 Routing Information/Connectivity to Wireline E911 Network**

As of this filing, through Intrado, Cordia will have access to 154 E911 Selective Routers by November 28, 2005 and through Intrado will be able to route all 911 calls in compliance with the VoIP 911 order where Intrado has coverage. The attached Major Market Rollout Map and the VoIP Deployment Plan reflects the major market deployment schedules. Please note, the attached map represents major markets where Intrado has connectivity to at least one (1) selective router, ALI steering and the ability to populate ALI.

**3. Transmission of ANI and Registered Location Information**

Cordia is not currently transmitting the 911 caller's ANI and Registered Location to all answering point that are capable of receiving and processing this information because it is currently in the process of integrating its network with Intrado's for deployment of a 911 solution.

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Upon successful integration, which we anticipate by year end 2005, in the event of a 911 call, Cordia will transmit the callers' ANI and location information to all answering points that are capable of receiving this information and are accessed by Intrado.

In addition, Cordia would like to point out that in the process of this integration, the parties are aware of unique deployment circumstances in New Jersey, Ohio, Hawaii, and in Puerto Rico that operate off E911 Select Routers but will not meet the full FCC mandate. These areas have native Selective Routing functionality but will only provide ANI service to the PSAP. Intrado has been granted permission in New Jersey, which represents 3% of the total United States population, to deploy a voice only service, which includes the call taker receiving ANI on the VoIP 911 caller. This system is not however, capable of full dynamic ALI updates and will require an upgrade. To date, Ohio representing 4% of the total United States population, Hawaii representing 5% of the total United States population and Puerto Rico representing 3% of the total United States population have not granted Intrado permission to deploy a voice only solution.

Specific metrics are detailed on the attached VoIP deployment plan spreadsheet.

#### **4. 911 Coverage**

Intrado is working on nationwide VoIP E911 delivery in accordance with the Commission's Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the United States based on customer subscriber base priorities. The attached Major Market Deployment Map, which corresponds with MSAs, identifies regions within Cordia's territory that has connectivity to at least one selective router, ALI steering capabilities, ANI and the ability to populate ALI. These areas are planned for deployments by November 28, 2005, March 31, 2006, and June 20, 2006.

#### **5. Obtaining Initial Registered Location Information**

Each customer at the point of sale provides the physical address where the Telephone Adapter ("TA") will be put into service. Orders for service are not processed without this information. Cordia refers to this address as the 911 Service Address and it can be wholly different than the customer's billing, shipping, or mailing addresses. The 911 Service is instantly transmitted via a real-time provisioning interface to Intrado's Validation and Update Interface (VUI). The VUI includes a geocoding process as well as management of Master Street Address Guide (MSAG) validation.

At the time of a VoIP 9-1-1 call, Intrado uses the customer's provisioned information to associate the location assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid address and Call Back Number of the user.

Cordia has the 911 Service Address for 100% of its VoIP customers.

#### **6. Obtaining Updated Registered Location Information**

Cordia customers may update their 911 service address by one of two methods. The first is by contacting Cordia's customer service center and asking a customer service representative to change the address. The second is by accessing their account by logging into their account to update their registered location.

## **7. Technical Solution for Nomadic Subscribers**

By utilizing Intrado's 911 Mobility Service Cordia is able to route VoIP emergency calls from its VoIP network to the Intrado Network or alternative third party network for delivery to the appropriate Selective Router and then on to the geographically appropriate PSAP via the native 911 infrastructure. The services utilized provide a "native" 911 solution for routing VoIP calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The 911 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon arrival into a new location. Through the validation and updated interface the 911 solution will enable the near real time provisioning (Geocoding and MSAG validation) of the newly provisioned address and make available (assuming no errors) that user's information for delivery to the PSAP within 15 minutes of receipt.

Intrado recognizes the need for removing the user interaction and self provisioning portion of the solution. To that end, Intrado is actively working and trialing a number of location determination technologies, which will be supported by Intrado and the Intrado provisioning interface.

In addition, Cordia is developing its network to include IP detection so that if a customer changes his/her location they will automatically be sent an email requesting a registered location update. In addition to our planned deployment of IP detection, Cordia periodically sends its customers correspondence indicating that they have not logged into their account in a specified period of time and requiring them to log into their account to confirm or update their registered location as necessary. Because we can not guarantee 100% accuracy with IP detection, Cordia will continue its practice of periodically emailing its customers to confirm the 911 service address.